

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION, et al.,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

Case No. 2:23-cv-01495-JHC

**DECLARATION OF LEE ROACH
IN SUPPORT OF DEFENDANT'S
OPPOSITION TO PLAINTIFFS'
MOTION TO COMPEL
PRODUCTION OF DOCUMENTS**

I, Lee Roach, declare as follows:

1. I am over eighteen years of age and I am competent to make this declaration. The statements herein are true and within my personal knowledge.

2. Since November 14, 2022, I have served in Amazon.com, Inc.'s ("Amazon") Litigation Department as Corporate Counsel of Litigation and Regulatory for Amazon's Competition Legal team. I am an attorney and active member in good standing licensed to practice in the District of Columbia and the State of Virginia.

3. I make this declaration in support of Amazon's Opposition to Plaintiffs' Motion to Compel Production of Documents. From the course of my duties and responsibilities, I have knowledge of Amazon's business practices, including the contents and treatment of certain types of documents and information as confidential, and Amazon's methods for storing or maintaining

1 certain types of documents. This includes the personnel files and foreign regulatory materials
2 that are at issue in Plaintiffs' Motion to Compel.

3 4. The internal personnel reviews, evaluations, and promotional materials sought by
4 Plaintiffs' Motion to Compel contain highly sensitive information. These documents contain
5 detailed evaluations of employees' personal and professional strengths and weaknesses, and
6 discuss at length why some were promoted while others were not. Amazon treats these files as
7 some of the most confidential and sensitive files it possesses, and access to them are highly
8 restricted, even within Amazon's central repository of these documents.

9 5. Additionally, collecting all of the foreign regulatory and investigatory documents
10 that Plaintiffs seek would be a significant burden for Amazon and its legal department. Amazon
11 operates in multiple locations globally, and sometimes interacts with regulators in many of those
12 jurisdictions. There is no single repository within Amazon that collects and stores all documents
13 and data exchanged between Amazon and these regulators.

14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct.

16 EXECUTED on this 20th day of November, 2024 in Washington, D.C.

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19 _____
20 Lee Roach
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